



**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

HENRY M. DAVIS,

Plaintiff,

vs.

MICHAEL WHITE, et al.,

Defendants.

Case No. 4:10-CV-1429 NAB

**PLAINTIFF'S FINAL PRE-TRIAL PROPOSED EXHIBIT LIST**

COMES NOW Plaintiff Henry M. Davis, and hereby submits the following final proposed exhibit list:

<u>No.</u>	<u>Description</u>	<u>Will/May be introduced</u>	<u>902(11) or 902(12) Authentication</u>
✓ P-1	Section 29.61 of the revised Code Of the City of Ferguson, 1998	Will 3-24	No
✓ P-2	Defendant John Beaird 9/24/2009 Complaint/Information – Tihen Uniform	Will 3-24	No
✓ P-3	Defendant John Beaird 9/24/2009 Complaint/Information – Pillarick Uniform	Will 3-24	No
✓ P-4	Defendant John Beaird 9/24/2009 Complaint/Information – White Uniform	Will 3-24	No
✓ P-5	Defendant John Beaird 9/24/2009 Complaint/Information – Beaird Uniform	Will 3-24	No
P-6	Reserved	May	No
✓ P-7	9/20/2009 Jail Video	May	No

P-7-1	Reserved	May	No
P-7-2	Reserved	May	No
✓P-8	Pillarick Jail Notes – 9/20/2009	May 3-24	No
✓P-9	Michael White Medical Records - Christian Hospital 3-25	May	Yes
P-10	Michael White Employee Injury/Illness Report (REDACTED)	May	No
P-11	Reserved	May	No
P-12	Reserved	May	No
P-13	Reserved	May	No
P-14	Reserved	May	No
✓P-15	Non-Lethal Force Report - 9/20/2009 (REDACTED)	May 3-24	No
✓P-16-1	Jail Photo #1 3-24	May	No
✓P-16-2	Jail Photo #2 3-25	May	No
P-16-3	Jail Photo #3	May	No
P-16-4	Jail Photo #4	May	No
✓P-16-5	Jail Photo #5 3-25	May	No
✓P-16-6	Jail Photo #6 3-25	May	No

Respectfully submitted,

SCHOTTEL & ASSOCIATES, P.C.

BY: s/James W. Schottel, Jr.

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Attorney for Plaintiff  
Henry M. Davis

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2014, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

Peter J. Dunne  
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Attorneys for Defendants  
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Kim Tihen  
City of Ferguson, Missouri

s/James W. Schottel, Jr.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
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HENRY M. DAVIS,

Plaintiff,

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JOHN BEAIRD,

Defendant, and

MICHAEL WHITE,

Counterclaim Plaintiff,

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HENRY M. DAVIS,

Counterclaim Defendant.

Case No.: 10-cv-1429 NAB

***DEFENDANT OFFICER JOHN BEAIRD AND COUNTERCLAIM  
PLAINTIFF OFFICER MICHAEL WHITE'S MOTION FOR  
LEAVE TO SUPPLEMENT PROPOSED TRIAL EXHIBITS L-1  
AND L-2***

COME NOW Defendant, Officer John Beaird, and Counterclaim Plaintiff, Officer Michael White, move the Court enter its order permitting these parties to amend their list of exhibits to include Exhibits L-1 and L-2, which are the VHS video tapes of the City of Ferguson Jail and Police Station on September 20, 2009. This Honorable Court ruled during the pre-trial conference to allowing reference to the presence of video cameras in the jail, and the identified exhibits are the VHS tapes that were retained and preserved by the City of Ferguson.

The Plaintiff has Plaintiff has listed a CD version copy of these recordings as Exhibits.  
Ex. P-7.

WHEREFORE, Officers White and Beaird request that this Court grant leave to supplement their list of exhibits, and for such further relief as this Court deems just and proper.

/s/ Peter J. Dunne

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 21st day of March, 2014 to be served by operation of the Court's electronic filing system upon the following:

Mr. James W. Schottel, Jr.  
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/s/ Peter J. Dunne

March 21, 2014